

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LISA D. BRYAN

Plaintiff

v.
LUCENT TECHNOLOGIES, INC.

Defendant

JENNIFER MAZZARELLO

Plaintiff

v.
LUCENT TECHNOLOGIES, INC.
Defendant

Civil Action No. AMD 03 CV 0265 ✓

Civil Action No. AMD 02 CV 3576

CONSENT MOTION TO CONSOLIDATE

Lisa D. Bryan and Jennifer Mazzarello, Plaintiffs, by and through their attorney, Paul V. Bennett, hereby file this Motion to Consolidate pursuant to FRCP 42, and for grounds state:

1. That on or about August 20, 2002, Jennifer Mazzarello, Plaintiff, filed in the Circuit Court for Anne Arundel County a Complaint against Lucent Technologies, Defendant ("Defendant Lucent"), alleging gender discrimination and harassment, retaliation, and hostile work environment. Defendant Lucent subsequently filed a Notice of Removal to the United States District Court for the District of Maryland, Civil Action Number AMD 02 CV 3576.

2. That on or about January 29, 2003, Lisa D. Bryan, Plaintiff, filed in this Court a Complaint against Defendant Lucent, alleging gender discrimination and harassment.

JAN 30 2003

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U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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DISTRICT OF MARYLAND

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retaliation, and hostile work environment.

3. That the allegations raised by Lisa D. Bryan and Jennifer Mazzarello, Plaintiffs, in their respective Complaints involve common questions of law and fact, and involve common fact witnesses.

4. That it is appropriate to consolidate the above cases, as a consolidation of these matters will prevent unnecessary costs and delay.

5. That Defendant Lucent has consented to the consolidation of the above matters, as well as to the issuance of a new Scheduling Order.

WHEREFORE, Lisa D. Bryan and Jennifer Mazzarello respectfully request that this Honorable Court consolidate their respective cases, and that a new Scheduling Order be issued forthwith.

Respectfully Submitted,

DENIED **THIS** 3rd
DAY OF FEB, 2003
Andre M. Davis

ANDRE M. DAVIS
UNITED STATES DISTRICT JUDGE

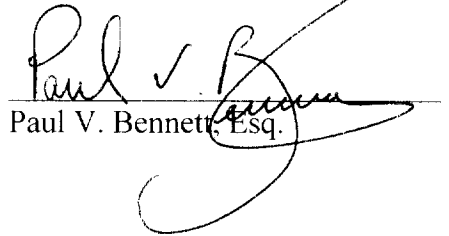
Paul V. Bennett

Paul V. Bennett, Esq.
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Annapolis, Maryland 21401
(410) 974-6000
Federal Bar No. 10324

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of January, 2003, that a copy of the foregoing Motion to Consolidate was sent by first class mail, postage prepaid, to Robert R. Niccolini, Esquire, McGuire Woods, L.L.P. 7 St. Paul Place, Suite 1000, Baltimore, Maryland 21202, counsel for Lucent Technologies, Inc., Defendant.


Paul V. Bennett, Esq.